

South West Arterial Drainage Maintenance & Construction

Teach Theampall Mungairit, Mungairit, Co Luimnigh  
Templemungret House, Mungret, Co Limerick, V94 EK07  
T +353 61 227 139



**OPW**

Oifig na  
nOibreacha Poiblí  
Office of Public Works

**An Coimisiún Pleanála**  
**64 Marlborough Street,**  
**Dublin1,**  
**DO1 V902**

**Dear Sir/Madam**

Please find attached an observation on Case Ref. PAX91.323448, Permission for windfarm located in the Townlands of Garrane, Ballynagoul, Greggane and Chareville, County Limerick.

Regards Dennis O'Keeffe  
29/08/25

<b>AN COIMISIÚN PLEANÁLA</b>	
LDG-	_____
ACP-	_____
<b>11.2 SEP 2025</b>	
Fee: €	_____ Type: _____
Time: <u>AKS</u>	By: <u>BSM</u>

**OPW**

Oifig na  
nOibreacha Poiblí  
Office of Public Works

*South West Arterial Drainage Maintenance & Construction*

**Teach Theampall Mungairit, Mungairit, Co Luimnigh**  
Templemungret House, Mungret, Co Limerick, V94 EK07  
T +353 61 227 139

**To: An Coimisiún Pleanála**  
**64 Marlborough Street,**  
**Dublin 1,**  
**DO1 V902**

**O.P.W Ref No. 219-2024**

**Case Ref. PAX91.323448 Permission for windfarm located in the Townlands of Garrane, Ballynagoul, Greggane and Chareville, County Limerick**

**Dear Sir or Madam,**

I refer to Case No. PAX91.323448

OPW Drainage Maintenance comments on this proposal are in relation to the Office of Public Works statutory duty to maintain Drainage Scheme's under the Arterial Drainage Act. Further submissions may be made by the OPW concerning the estate portfolio, heritage and other areas of responsibility.

The Windfarm site encapsulates the following channels - C1 Maigue, C1/34, C1/35, C1/35/1, C1/36, C1/36/1, C1/37 and C1/37/1 of the Maigue Scheme for which maintenance responsibility lies with this office. In order to gain access for the purpose of maintaining said channel and embankment, this office requests that the following be included as a condition of any Grant of Planning Permission at this location.

**Conditions for maintenance**

A 10 Metre wide strip of land running parallel to the main channels C1, Maigue, C1/34 and a 5 Metre wide strip of land running parallel to the channels C1/35, C1/35/1, C1/36, C1/36/1, C1/37 and C1/37/1, should be provided to facilitate access and maintenance activities by this office in the immediate area. This Area should be accessible to mechanical plant and should not be landscaped, paved or otherwise developed in a manner that would prevent access.

The Site of the proposed development, falls within the area deemed to benefit from drainage by Channel C1, C1/34, C1/35, C1/35/1, C1/36, C1/36/1, C1/37 and C1/37/1 of the Maigue Scheme and as a result is subject to an increased flood risk. The Maigue Scheme was originally constructed to a standard to protect agricultural land from flooding and as such does not confer the level of immunity usually associated with residential, commercial and Industrial developments. Please find attached a copy of a map excerpt, showing "Benefiting Land" shaded in green and C1, C1/34, C1/35, C1/35/1, C1/36, C1/36/1, C1/37 and C1/37/1 Maigue delineated in blue.

OPW therefore considers that the An Coimisiún Pleanála / applicant should satisfy themselves that due consideration is given to flood risk at this site, particularly in the context of climate change, through the development of a Flood Risk Assessment and management plan specific to this site.

Any alterations or modifications of drainage channels would require section 9 consent of the Arterial Drainage Amendment Act, 1995.

Obtaining Section 9 consent information on the process, including copies of the appropriate application form and brochure, are available on our website at

<https://www.gov.ie/en/publication/957aa7-consent-requirements-constructionalteration-of-watercourse-infrastru/>. Note Section 50 requirements for the bridges will apply.

The proposal identifies a number of new bridges and culverts. Any new culverts or bridges (or modifications to any existing culverts or bridges) that are required to cross watercourses as part of the development or that form part of any proposed or existing access roads to serve or access the development; you should be aware that these require consent from the Commissioners of Public Works. This is a requirement of Section 50 of the Arterial Drainage Act of 1945 as amended.

Obtaining Section 50 consent information on the process, including copies of the appropriate application form and brochure, are available on our website at

<https://www.gov.ie/en/publication/957aa7-consent-requirements-constructionalteration-of-watercourse-infrastru/>

Please note that, in the context of seeking consent under Section 50, the current required design standard for bridges or culverts is based on the flood flow with an annual exceedance probability (AEP) of 1% (often referred to as the 100 year flood), increased by 20% to cater for the effects of climate change. Bridges or culverts are required to be able to convey this design flood without significantly altering the hydraulic characteristics of the watercourse – further details on this issue are available in the brochure and can be clarified depending on the circumstances of any particular proposed bridge or culvert.

You should be aware that a grant of Planning Permission by a planning authority for a development which contains bridges or culverts does not confer section 50 consent or Section 9 consent on the applicant, nor does it absolve the applicant from the requirement to obtain such consent from the Commissioners.

**Yours Faithfully,**  
**Dennis O’Keeffe**  
**29/08/2025**



Case Reference ABP PAX91.323635/ 323448-25  
Administrative Officer  
Strategic Infrastructure Development Section,  
An Coimisún Pleanála,  
64-67 Marlborough Street,  
Dublin 1  
D01 V90

**31<sup>st</sup> October 2025**

**ACP- PAX91.323635/ 323448-25: Proposed Development of the Garrane Green Energy Windfarm Project located within the townlands of Ballynagoul, Creggane, and Garrane, Charleville and Kilmallock, County Limerick**

A Chara,

## **1.0 INTRODUCTION**

The Office of Public Works (OPW) is a central Government Office operating under the Minister for Public Expenditure, NDP Delivery and Reform with particular responsibility for Flood Risk and Estate Management, including Heritage. The Office of Public Works (OPW) has responsibility for the care, operation and maintenance of all National Monuments in State Care. Our principal objective is to protect, conserve, maintain and present these sites and to facilitate appropriate public access where possible. In this regard, OPW works in partnership with the National Monuments Service at the Department of Housing, Local Government and Heritage (DHLGH).

This submission outlines observations from the OPW on the Strategic Infrastructure Development application by Garrane Green Energy Limited to An Coimisún Pleanála for planning permission in respect of the construction of a nine-turbine windfarm within the townlands of Ballynagoul, Creggane, and Garrane, Charleville and Kilmallock, County Limerick.



## 2.0 PROPOSED WORKS (PAX91.323635/ 323448-25)

The proposed development will consist of the following:

- Erection of 9 No. wind turbines with a tip height of 170m. The wind turbines will have a rotor diameter of 150m and a hub height of 95m.
- Upgrade of existing Access Tracks and construction of new permanent Access Tracks, permanent turbine hardstand areas and turbine foundations.
- Construction of two new bridge crossings onsite, one over the River Maigne and one over the Charleville Stream.
- Upgrade of existing site drainage network and installation of new site drainage.
- Wind Farm Internal Cabling connecting the wind turbines to the electrical substation.
- Construction of a permanent on-site AIS 110kV Substation, with a 'loop in' Grid Connection to the existing 110kV overhead line between Charleville and Killonan, including two single storey control buildings with welfare facilities, all associated electrical plant and equipment, security fencing, gates, signage, all associated underground cabling, private well for water supply, wastewater holding tank, and all ancillary structures and works.
- Construction of a permanent double circuit 110kV underground cable and two steel cable interface masts to connect to the existing overhead line OHL.
- Erection of a permanent 60m Meteorological Mast for monitoring wind speeds.
- Construction of a Temporary Construction Compound for use during construction.
- Upgrade of the existing entrance on the N20 (Site Entrance 1) (to be used for abnormal loads and turbine component delivery) and upgrade of an existing site entrance on the L1537 (Site Entrance 2) (to be used for all construction traffic except for abnormal loads and turbine component delivery).
- 6 No. temporary spoil storage areas and 1 No. permanent spoil storage area.
- Biodiversity enhancement and improvements associated with the Project.
- Landscaping, fencing and all associated ancillary works.

This application is seeking a ten-year permission and a 35-year operational period from the date of overall commissioning of the entire wind farm.



### 3.0 OBSERVATION

The OPW notes that the following National Monuments in State care are located within a 20km radius of the windfarm (all distances approximate):

NM 212	Kilmallock Friary	6.4km east
NM 408	Kilmallock Collegiate, Church	6.45m east
NM 173	King's Castle, Kilmallock	6.4km east
NM 680	Medieval house, Kilmallock	6.4km east
NM 576	De Valera's Cottage	3.9km north
NM 314	Ardskeagh Church	6.5km south
NM 490	Kilbolane Castle	11 km
NM 333	Liscarroll Castle	15 km
NM 247	Lough Gur	17 km
NM 301	Ballybeg West Castle	18 km
NM 202	Buttevant Friary	18 km
NM 622	Adare Castle	18.5 km
NM 395	Tullylease Church	19 km
NM 194	Hospital Church	20 km

The planning documentation has assessed the impact on some, but not all of the National Monuments in State Care.

#### **Kilmallock NMs No.s 212, 408, 173, 680 (4.5 km)**

The application has assessed the impact on a view from Kilmallock GAA club (VP11) as low-negligible in magnitude on the basis that blade sets are partially visible above the dense band of mature vegetation in the distance, and on the presence of manmade structures within that view. The submission extrapolates that the same will apply to the 4no. National Monuments in State Care. The OPW notes that the impact assessment is relying on screening by trees, which, if deciduous will provide reduced screening for half of the year, and which may be prone to normal and climate change accentuated risks such as storm, pest and disease damage and/or loss. In addition, if the trees are outside the ownership and control of the applicant, the maintenance of the screening effect is outside of their control. The OPW requests that An Coimisún Pleanála seek verifiable visual impact as additional information

Ceann Oifig, Sráid Jonathan Swift, Baile Átha Troim, Co. na Mí, C15 NX36

Head Office, Jonathan Swift Street, Trim, Co. Meath, C15 NX36

T +353 46 942 6000 | [info@opw.ie](mailto:info@opw.ie)

[www.opw.ie](http://www.opw.ie)



(e.g. wireframe/ photomontage) to demonstrate the visual impact, if any, on these statutorily protected heritage properties. Any impact assessment should include cumulative impacts.

### **Lough Gur NM 247 (17 km)**



Lough Gur is located 17km to the northwest (VP21). The OPW notes that the turbines will be located in the centre of the protected view from this highly significant archaeological site and location of natural beauty. The OPW is concerned about the visual impact of this proposed development and the cumulative impact as presented in the planning application documentation.

### **De Valera's Cottage NM 576 (3.9km north)**

Despite the proximity of De Valera's cottage, the visual impact on this heritage property has not been undertaken. The OPW requests that An Coimisún Pleanála seek verifiable visual impact assessment documentation as additional information (e.g. wireframe/ photomontage) to demonstrate the visual impact, if any, on this statutorily protected heritage property. Any impact assessment should include cumulative impacts.

### **Liscarroll Castle NM 333 (15 km)**

The OPW requests that An Coimisún Pleanála seek verifiable visual impact assessment documentation as additional information (e.g. wireframe/ photomontage) to demonstrate the

**Ceann Oifig, Sráid Jonathan Swift, Baile Átha Troim, Co. na Mí, C15 NX36**

Head Office, Jonathan Swift Street, Trim, Co. Meath, C15 NX36

T +353 46 942 6000 | [info@opw.ie](mailto:info@opw.ie)

[www.opw.ie](http://www.opw.ie)



visual impact, if any, on these statutorily protected heritage properties. Any impact assessment should include cumulative impacts.

#### 4.0 CONCLUSION

The OPW requests that An Coimisún Pleanála seek verifiable visual impact assessment information, including cumulative impact, on National Monument heritage receptors. This will enable An Coimisún Pleanála, the OPW and others to assess the potential visual impact on the cultural heritage significance of these nationally important protected places. Furthermore, the OPW is concerned about the visual impact on the proposed turbines on views from the internationally significant Lough Gur.<sup>1</sup> The OPW requests that An Coimisún Pleanála take into consideration the concerns raised in this letter.

Yours sincerely

Anthony Read  
Principal Officer  
Heritage Services

---

Oifig na nOibreacha Poiblí  
Office of Public Works

Sráid Jonathan Swift  
Jonathan Swift Street,

Baile Átha Troim  
Trim

Co na Mí  
Co. Meath  
C15 NX36

---

<sup>1</sup> <https://heritageireland.ie/places-to-visit/lough-gur-visitor-centre-lakeshore-park/>  
Ceann Oifig, Sráid Jonathan Swift, Baile Átha Troim, Co. na Mí, C15 NX36